

1 Jennifer L. Braster
2 Nevada Bar No. 9982
3 Benjamin B. Gordon
4 Nevada Bar No. 15552
5 NAYLOR & BRASTER
6 1050 Indigo Drive, Suite 200
Las Vegas, NV 89145
Telephone: (702) 420-7000
Facsimile: (702) 420-7001
jbraster@nblawnv.com
bgordon@nblawnv.com

7 Attorneys for Defendant
8 EXPERIAN INFORMATION
SOLUTIONS, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

13 || RAE ANN ODELL

15 Plaintiff.

16 | v.

17 ALPHAEON CREDIT INC.;
18 EXPERIAN INFORMATION
19 SOLUTIONS, INC.; TRANS UNION,
LLC; EQUIFAX INFORMATION
SERVICES LLC.

20 Defendants.

Case No. 2:22-cv-00037-APG-BNW

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT EXPERIAN
INFORMATION SOLUTIONS, INC. TO
RESPOND TO COMPLAINT**

FIRST REQUEST

Pursuant to the Local Civil Rule IA 6-2, Plaintiff Rae Ann Odell (“Plaintiff”) and Defendant Experian Information Solutions, Inc. (“Experian”), through their respective attorneys of record, hereby stipulate that Experian shall have an additional 14 days, up to and including **February 14, 2022**, to answer or otherwise respond to Plaintiff’s Complaint. Experian requires additional time to investigate Plaintiff’s allegations and discuss the possibility of early settlement with

1 Plaintiff. This is the first request for an extension of time sought by Experian in
2 this action. The requested extension is sought in good faith and not for the
3 purposes of delay or any other improper reason and will not alter the date of any
4 event or any deadline already fixed by Court order.

5 THEREFORE, Plaintiff and Experian hereby stipulate and agree to, and
6 respectfully request, an order extending the time for Experian to answer, object, or
7 otherwise respond to Plaintiff's Complaint, up through and including **February 14,**
8 **2022.**

9
10 Dated: January 28, 2022 NAYLOR & BRASTER LAW
11

12 By: /s/Benjamin B. Gordon
13 Jennifer Braster
14 Benjamin B. Gordon
15 Attorney for Defendant
16 EXPERIAN INFORMATION
17 SOLUTIONS, INC.
18

19 Dated: January 28, 2022 KAZEROUNI LAW GROUP, APC
20

21 By: /s/Gustavo Ponce
22 Gustavo Ponce
23 Mona Amini
24 Attorneys for Plaintiff
25 RAE ANN ODELL
26

27 **ORDER**

28 IT IS SO ORDERED.
29

DATED: January 31, 2022.


30 UNITED STATES MAGISTRATE JUDGE
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